

Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROXENSE, LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONICS, CO., LTD.AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case Nos. 6:21-cv-00210-ADA

JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION TO TODD BURGER

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs hereby provides notice that they intend to take the deposition of non-party Todd Burger ("Burger").

Burger is instructed to testify by videotaped deposition on July 29, 2022 at 9:00am EST at the Aloft Hotel, 727 Marrett Rd. A, Lexington, MA 02421 in person. The deposition will continue from day to day, excluding Saturdays, Sundays, and holidays, until completed. The deposition will be recorded by stenographic means as well as by using video or audio recording technology.

Dated: July 26, 2022

Respectfully submitted,

By: /s/ David L. Hecht
David L. Hecht
Maxim Price
Yi Wen Wu
Conor McDonough
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2022, the foregoing was served via electronic mail on all counsel who have consented to electronic service.

/s/ David L. Hecht
David L. Hecht

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Case Nos. 6:21-cv-00210-ADA

JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION TO STUART LIPOFF

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs hereby provides notice that they intend to take the deposition of non-party Stuart Lipoff ("Lipoff").

Lipoff is instructed to testify by videotaped deposition on August 3, 2022 at 9:00am PST, at the offices of Quinn Emanuel Urquhart & Sullivan, LLP, 555 Twin Dolphin Dr., 5th Floor, Redwood Shores, California 94065 in person. The deposition will continue from day to day, excluding Saturdays, Sundays, and holidays, until completed. The deposition will be recorded by stenographic means as well as by using video or audio recording technology.

Dated: July 26, 2022

Respectfully submitted,

By: /s/ David L. Hecht
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Counsel for Plaintiffs

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David L. Hecht

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JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION TO BRAD FRIEDLANDER

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs hereby provides notice that they intend to take the deposition of non-party Brad Friedlander ("Friedlander").

Friedlander is instructed to testify by videotaped deposition on August 1, 2022 at 8:00am EST at the Holiday Inn Express, 8 Independence Dr., Chelmsford, MA. 01824 in person. The deposition will continue from day to day, excluding Saturdays, Sundays, and holidays, until completed. The deposition will be recorded by stenographic means as well as by using video or audio recording technology.

Dated: July 26, 2022

Respectfully submitted,

By: /s/ David L. Hecht
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

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/s/ David L. Hecht
David L. Hecht